



**Environmental
Operations, Inc.**

E.C.
6/12/03

June 17, 2003

EPA Region 5 Records Ctr.
285076

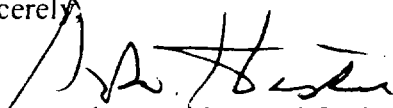
U. S. Environmental Protection Agency
William Ryczek
Emergency Enforcement & Support Section, SE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Ryczek:

Enclosed please find Environmental Operations, Inc.'s (EOI) Responses to Requests for Information regarding the RRG/Clayton Chemical Company Superfund Site, 1 Mobile Avenue in Sauget, St. Clair County, Illinois.

Please contact me with any questions or comments on the Responses.

Sincerely,


Stacy Hastie, President and CEO
Environmental Operations, Inc.

Environmental Consulting & Remediation

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Environmental Operations, Inc.

Response to USEPA's
Request for Information
Re: Clayton Chemical Co.

1. Stacy Hastie, President and CEO
Environmental Operations, Inc.
757 South 2nd Street
St. Louis, MO 63102

Also: David Wieties and Charles Hilse of Environmental Operations, Inc. (EOI)

Note: EOI employee David Wieties was consulted and assisted in preparation of this response. Mr. Wieties may have additional information regarding this site which may be of interest to the PRP's by virtue of his former employment at Clayton Chemical Company. Mr. Wieties has verbally agreed to an interview with the PRP Group and will address inquiries made to him personally at that time. However, the responses contained herein only reflect knowledge and information related to business transactions between EOI and Clayton Chemical Co. or the Resource Recovery Group.

2. Customer List of EOI, however, we anticipate the manifest record maintained by IEPA would be the authoritative record of material contribution to the site.
3. Any specific person known by EOI will be identified in each enumerated Information Request response. In general, it would be the former owners, operators, and employees of Clayton Chemical/RRG.
4. EOI had a temporary EPA ID# (MOP000039438) in 1994. The number has expired. EOI had a Missouri Generator ID# (027191).
5. Respondant has no knowledge.
6. Roger Hopson, Charles Hilse, Grant Ure, Matt Robinson, Bill Atkins...all prior owners or employees of EOI involved in hazardous substances management. EOI is an environmental consultant and, therefore, handles material in that capacity for customers.
7. Yes, EOI "otherwise handled" customer material.
 - a. Generally, liquid and solid hazardous materials including flammable solvents, oils, paints, acids, bases, PCB's, chlorinated solvents.
 - b. Customers who were material generators.
 - c. EOI was involved in remediation and materials consolidation projects on behalf of customers in situations in which the material EOI worked with went to the Clayton Chemical facility. EOI's involvement was limited to "handling" the material as a consultant. On occasion EOI would sign, on behalf of the customer, the manifests for the material handled as an accommodation for the customer when the customer was not readily available. EOI's involvement in where the material was sent was never more than a recommendation. Without the customer's approval the material would not be sent to Clayton Chemical. All material handled by EOI was done so in compliance with applicable laws and regulations.
 - d. On an intermittent basis since 1986.

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- e. EOI recommended Clayton Chemical Co., and many others, for management of its customer's hazardous substances.
- f. We cannot confirm the volume contribution without conducting a FOIA request to IEPA regarding the manifest records of former customers.
8. EOI has no knowledge of any matters concerning Koch Industries.
- 8a. EOI has no knowledge of the whereabouts of Richard Lee.
9. EOI does not believe it has any applicable insurance coverage. EOI was not incorporated until 1986.
10. EOI is only answering the Information Request at this point, and does not believe tax returns provide useful information. Should EOI's liability become an issue EOI will consider providing this sensitive information.
11. EOI is only answering the Information Request at this point, and does not believe Articles of Incorporation, audited financial statements, a list of assets or a list of investments provide useful information. Moreover, item (c) which is a list of current assets and liabilities and owners or parties responsible for same is vague, ambiguous and burdensome, and item (d) which requests a list of investments is also vague, ambiguous and burdensome. Should EOI's liability become an issue EOI will consider providing this sensitive information.
12. Not applicable.
13. Not applicable.
14. EOI did not arrange for disposal or treatment or arrange for transportation for disposal or treatment of waste materials. Manifests maintained by IEPA would contain information leading to the identification of the parties who made such arrangements. Inasmuch as such manifests would have to be consulted, EOI has no information responsive to Requests a – q.
- Note – between Request 14 and 15 there is a request marked “1” concerning “viscous material”. EOI has no knowledge concerning the material.
15. See response to 7c.
16. EOI never owned, operated, or leased the site.
17. - 24. EOI has no authoritative information regarding these inquiries.
25. EOI or its consultants have no current plans for Site investigation.
26. - 29. EOI has no information regarding these inquiries.
30. The only relationship of which EOI is aware is as described in response to 7c.
31. EOI has no authoritative information regarding these inquiries.
32. EOI has no information regarding these inquiries for entities other than EOI. As to EOI, the current legal status in Illinois is that it is licensed to do business in Illinois, it was founded by Roger Hopson. EOI has no delinquent tax obligations, to the best of its knowledge.

33. EOI is not aware of any such policies.

34. (omitted).

35. EOI has no authoritative information regarding these inquiries.

36. EOI is a Missouri Corporation in good standing.